UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Robert Manchel, Esq.
1 Eves Drive, Suite 111
Marlton, NJ 08053
Attorney for Debtor
RM-1141

In Re:

      Justice Watts

Case No. 19-28370JNP

Judge:

Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

X   **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following (**choose one**):

1. _____ Motion for Relief from the Automatic Stay filed by **_____**, creditor. A hearing has been scheduled for **_____**, at **_____** a.m.

                OR

       ____ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for _____ at _____ a.m.

                OR

       ____ Certification of Default filed by _____, creditor. I am requesting that a hearing be scheduled on this matter.

                OR

       X   Certification of Default filed by Standing Chapter 13 Trustee. I am requesting that a hearing be scheduled on this matter.

2.   I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of $_____, but have not been accounted for. Documentation in support is attached hereto.

OR

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

__X__ Other: I believe that I am current, as I have paid every monthly trustee payment on a timely basis. However, based on the trustee's records, I am $2,905.00 in arrears with my trustee payments.

My last payment of my 60 month plan is due in September of 2024. I just made a $1,328.00 payment. After the application of the payment, my arrears will be $1,577.00. I will cure the balance of my arrears by capitalizing the arrears through my last two trustee payments. I respectfully request that the court allow me to cure the arrears and allow my plan to continue.

3.   This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4.   I certify under penalty of perjury that the foregoing is true and correct.

Date: 7/22/2023   /s/ Justice Watts
                                             Justice Watts, Debtor